

## EPA Comments on Title V Renewal

U.S. Steel Corporation, Mon Valley Works, Clairton Plant (0052-OP22)

March 14, 2022

### **I. PERMIT SUMMARY**

This action is a title V operating permit renewal for U.S. Steel Corporation, Mon Valley Works, Clairton Plant, a chemical manufacturing facility located in Allegheny County, Pennsylvania. The facility is the largest by-products coke plant in North America and was last issued a title V permit in 2012. This permit is being processed sequentially, i.e., a proposed permit should be submitted to EPA with a Response to Comments. The day EPA receives the revised proposed permit would be Day 1 of EPA's 45-day review.

### **II. COMMENTS:**

#### **A. Emissions Limits**

1. The permit incorporates new tables with lb/hr and tpy emissions limits for multiple pollutants. For instance, see Table V-A-1, V-A-2, V-A-3, V-B-1, etc (list is non-exhaustive). The review memo explains how maximum emissions limits were calculated, but the underlying regulatory authority is unclear. Permit conditions cite to many sources including, most frequently, subparagraphs of ACHD Article XXI 2105.21 Coke Ovens and Coke Oven Gas regulations and the SO<sub>2</sub> SIP IP 0052-I017. These authorities are related to SO<sub>2</sub> and particulate; however, the authority for other pollutants such as NO<sub>x</sub>, CO, and VOCs is unclear. Other non-pollutant specific regulations such as Article XXI §2103.12.g and §2105.03 (examples are non-exhaustive) are also cited.
  - a. Please describe the underlying authority for all emissions limits newly incorporated into this permit
  - b. Please ensure all emissions limits in the permit cite to the proper underlying regulatory authority

#### **B. Monitoring**

2. Please explain how continuous compliance with lb/hr and tpy emissions limits for each pollutant is ensured at facility Coke Batteries (P001-P003, P007-P009, P0010-P012, P046) and Boilers (B001, B002, B005-B008, B010). Given the variable operations of the facility and historic compliance issues, stack testing every two or four years (testing requirements vary by pollutant) does not seem adequate. We suggest increasing frequency to annual testing and incorporating periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit limits. See ACHD Article XXI §2103.12(i)(2) and 40 CFR §70.6(a)(3)(i)(B).

#### **C. Compliance Status**

3. EPA's Enforcement and Compliance History Online (ECHO) database indicates the facility has on an ongoing, unaddressed High Priority Violation for sulfur dioxide, beginning 2/28/2019. See <https://echo.epa.gov/detailed-facility-report?fid=110042043384>.

- a. Please provide information in the review memo about the current compliance status and compliance history of this facility.
- b. If the facility is out of compliance, a compliance schedule is required at operating permit issuance. See ACHD Article XXI §2103.12(d) and 40 CFR §70.6(c)(3).

Prepared by:  
Riley Burger  
U.S. Environmental Protection Agency Region III  
Air & Radiation Division  
Permits Branch (3AD10)  
1650 Arch Street  
Philadelphia, PA 19103  
burger.riley@epa.gov  
215-814-2217